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*Attorneys for Plaintiff  
Blue Acquisition Member, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BLUE ACQUISITION MEMBER, LLC,

Plaintiff,

v.

BAILEY PEAVY BAILEY, PLLC,

Defendant.

CASE NO. 2:14-cv-02013- GMN-NJK

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO  
RESPOND TO MOTION TO DISMISS,  
TRANSFER OR STAY**

**(Second Request)**

Plaintiff Blue Acquisition Member, LLC ("Plaintiff"), by and through its undersigned counsel, and Defendant Bailey Peavy Bailey, PLLC ("Defendant"), by and through its undersigned counsel, hereby state as follows:

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1           1.       On April 24, 2015, Defendant filed its Motion to Dismiss for Lack of Personal  
2 Jurisdiction or Alternatively Motion to Transfer Venue or Enter a Stay (Dkt. No. 32) (the  
3 “Motion”).

4           2.       The response to the Motion was originally due May 11, 2015.

5           3.       On May 8, 2015, the parties submitted a Stipulation and [Proposed] Order  
6 Extending Time to Respond to Motion to Dismiss, Transfer or Stay (First Request) (Dkt. No.  
7 33), requesting a one-week extension to allow Plaintiff to respond to the Motion based upon the  
8 trial schedule of counsel for Plaintiff, which the Court granted on May 18, 2015, (Dkt. No. 34).

9           4.       Thereafter, the parties attempted to resolve the Motion by agreement but were  
10 unable to do so.

11           5.       As a result of these negotiations, Plaintiff delayed the Opposition in the hope that  
12 the parties could consensually resolve the Motion. Because no agreement was reached, Plaintiff  
13 requested and Defendant agreed to another one-week extension to allow Plaintiff to respond to  
14 the Motion.

15           In light of the foregoing, the Parties stipulate and agree, subject to this Court’s approval,  
16 as follows:

17           1.       That the time for Plaintiff to respond to the Motion shall be extended;

18           2.       Plaintiff shall respond to the Motion by or before May 26, 2015.

19           Dated this 15th day of May, 2015.

20 HOLLEY, DRIGGS, WALCH, PUZEY  
21 & THOMPSON

PISANELLI BICE PLLC

22 By: /s/ F. Thomas Edwards  
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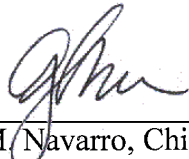
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**ORDER**

IT IS SO ORDERED that the time for Plaintiff to respond to the Motion shall be extended to May 26, 2015.

  
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Gloria M. Navarro, Chief Judge  
United States District Court

DATED: May 15, 2015

CASE NO. 2:14-cv-02013- GMN-NJK